



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

July 10, 2024

**BY CM/ECF**

The Honorable Sarah Netburn  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. William Lonergan Hill, S2 24 Cr. 82 (RMB)***

Dear Judge Netburn:

The parties in the above captioned matter respectfully request that the Court modify the following conditions of bail for Defendant William Hill.

**First**, at the request of Your Honor and Pretrial Services, the parties consent to the removal of the defendant's location monitoring requirement while he remains in the Southern and Eastern Districts of New York pending his departure to Portugal. The parties also propose that the defendant be allowed to return to Portugal after all of the conditions are met, with the exception of location monitoring. The parties are currently proposing that the defendant will obtain an Apple iPhone that will allow Pretrial Services to track the location of the cellphone, and if practicable, the defendant will also hire a private company that will install a GPS bracelet on the defendant and share the location data with the Government. Prior to the defendant's departure to Portugal, the parties will update the Court regarding whether the defendant will be subject to a GPS bracelet while in Portugal, and the Government may propose additional conditions if the GPS bracelet is not feasible. The parties would propose that any location-monitoring conditions be satisfied within 72 hours after the defendant arrives in Portugal.

**Second**, Judge Berman earlier today indicated during the initial conference that the bond should specifically indicate that the defendant will reside at [REDACTED] while on pretrial release. The parties respectfully request that this modification also be made to the bond.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel for Defendant William Lonergan Hill